

VIRGINIA DEPARTMENT OF TRANSPORTATION TITLE VI EVALUATION REPORT

As a recipient of federal funds the Virginia Department of Transportation (VDOT) is required to comply with certain federal, state and local laws and regulations. These laws and regulations include but are not limited to the following:

- Title VI of the Civil Rights Act of 1964 (42 USC 2000e)
- Executive Order 11246 "Equal Employment Opportunity" as amended by Executive Order 11375 and supplemented in the Department of Labor Regulations (41 CFR Part 60)
- Section 49 of the Code of Federal Regulation Part 21 and Part 23 CFR 710.405 (b)
- Americans with Disabilities Act of 1990
- Virginia Fair Employment Contracting Act Sections 2.1 – 374 through 2.1 – 376.1 of the Code of Virginia
- Virginians with Disabilities Act Sections 51.5 – 40 of the Code of Virginia

In brief, these laws and regulations require that a firm, its agents, employees, assigns or successors, and any person, firm or agency of whatever nature with whom it may contract or make agreement,

“will not discriminate against any employee, applicant for employment, or in the solicitation of subconsultants based on age, color, disability, national origin, sex, race, or religion.”

By contracting with VDOT, a firm is obligated to comply with the provisions listed above and provided in detail within the Memorandum of Agreement (MOA) executed between the Department and the selected consultant firm. VDOT's Equal Opportunity Division with assistance from the VDOT's Project Manager monitors a firm's compliance with the non-discrimination provisions.

To monitor compliance, each consultant and all subconsultant(s) are required to submit a Title VI Evaluation Report (form EEO-D2). This requirement is applicable for all firms with at least 15 or more employees. Firms with less than 15 employees are not required to submit a Title VI Evaluation Report form, unless their contract value is \$10,000 or greater.

TITLE VI EVALUATION REPORT

The Title VI Evaluation Report provides documentation on a firm's programs, policies, and practices. For example, specific information is requested regarding a firm's Equal Employment Opportunity Policy statement, advertising and recruitment processes, and employment data by race and sex.

VDOT will request a Title VI Evaluation Report within 10 days of notification of selection for new firms or firms that do not have a current report on file with VDOT. The Title VI Evaluation Report should be submitted to the VDOT office negotiating the contract.

Once the Title VI Evaluation Report is provided to Virginia Department of Transportation, the Equal Opportunity Division's Title VI Coordinator reviews the information and issues a compliance determination. This determination is provided in writing to the VDOT's Project Manager within seven days of receipt by the Title VI Coordinator. When deemed necessary, the Title VI Coordinator may request additional information, recommend corrective actions, or schedule an on site review at the consultant's office.

If the report is accepted, and expiration date is established based on the date of the employment data provided. Typically the report remains current and on file with VDOT for a period of one year. An updated report is required annually for consultant firms who continue to perform under a contract with VDOT.

Failure to comply with the non-discrimination provisions may result in ceased negotiations, withholding of payments to a firm, cancellation, termination, or suspension of the contract in whole or in part.

Should you have any questions about VDOT's Title VI Program or the Title VI Evaluation Report, you may directly contact the Title VI Coordinator in VDOT's Equal Opportunity Division at 804-786-4414.



**VIRGINIA DEPARTMENT OF TRANSPORTATION
CIVIL RIGHTS ACT OF 1964
TITLE VI EVALUATION REPORT**

AS OF _____
Month Year

CONTRACTOR / ORGANIZATION IDENTIFICATION

1. Name and Address of Home Office:

2. Address of Virginia location where project will be done:

3. Type of Contractor / Organization

Private Firm

Governmental Agency

Other _____

Vendor

Supplier

3A. Firm's Total Workforce

3B. Workforce for Virginia Location

Total	% Minority	% Female	Total	% Minority	% Female

4. Business Ownership / Control

Minority ☐ Yes ☐ No

Female ☐ Yes ☐ No

5. Beginning Date of Work

Estimated Completion Date

5. Type of Organization and Work Performed

7. Is written Affirmative Action Compliance Program available? ☐ Yes ☐ No

8. E.E.O. Policy Statement (which includes the following prohibited discrimination: race, color, national origin, sex, age, religion, and disability.)

9. The following individual is the Equal Employment Opportunity Officer for the Contractor / Organization:

Name and Title _____

EEO Officer's Duties _____

The Equal Employment Opportunity Officer is capable of effectively administering and promoting an active equal opportunity program, and the Officer has been assigned adequate authority and responsibility to carry out his / her duties.

10. Does the Contractor / Organizer have at least 100 employees? ☐ Yes ☐ No

If answer is yes, has standard Form 100 (Employer Information Report EEO-1) been filed for current year as required by Title VII of Civil Rights Act of 1964? ☐ Yes ☐ No

11. Has the Contractor / Organizer participated in a previous contract or agreement subject to the equal opportunity clause as required by Executive Orders 10925, 11114, 11249, or 11375 and have filed with the Joint Reporting Committee, Director of Federal Contract Compliance, a Federal Contracting or Administering Agency, or the former President's Committee on Equal Employment Opportunity, all reports due under the applicable filing requirements? ☐ Yes ☐ No

12. I certify that the *data given in this report is correct* to the best of my knowledge. (Report has to be submitted with original signature, not a photocopy.)

Signature: _____

(Authorized Officer) (Title) (Date)

13.

The data below shall also be included in the figures for the appropriate occupational categories above

[illegible]

TITLE VI EVALUATION REPORT

I. INTRODUCTION

Following is a list of requirements which consultants must meet in order to be in compliance with Title VI of the Civil Rights Act of 1964. This report must be filed before a consultant will be eligible for VDOT contracts; thereafter, it must be updated and resubmitted annually in order for the consultant to remain eligible for VDOT contracts.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, sex, age, national origin, religion, or disability by any recipient receiving Federal funds. Below each requirement is a space for you to give *specific examples* of how your consulting firm complies with the requirement. **DO NOT SIMPLY RESPOND YES / NO.**

II. DISSEMINATION OF TITLE VI POLICY

A. Meetings with supervisory and personnel staff are conducted at which EEO compliance is discussed.

B. All new supervisors and hiring personnel are informed about the firm's EEO policies / procedures within thirty (30) days of starting employment.

III. ADVERTISING

The firm publicizes its EEO policies / procedures to all incumbent and prospective employees using notices, posters, employee handbooks, and meetings.

IV. RECRUITMENT

A. ALL employment advertisements contain the notation; "An Equal Opportunity Employer." *Attach a copy of an employment announcement advertised within the past year.*

B. *The firm's employment advertisements appear in publications having significant circulation among minorities. Please provide the names of these publications.*

C. *Please give the names of entities (state employment agencies, schools, universities, minority organizations, etc.) that the firm uses to recruit minority and female applicants.*

V. PERSONNEL ACTIONS

- A. How often does the firm evaluate wage policies to determine that there is no discriminatory intent or effect?

- B. How often does the firm review selected personnel actions (hirings, promotions, layoffs, terminations) for evidence of discriminatory intent or effect? Who performs these reviews?

VI. TRAINING / PROMOTION

The firm assists minority and female employees in participating in pre-apprenticeship, apprenticeship, and/or on-the-job training programs *within the geographical area of contract performance*. Give examples.

VII. SUBCONTRACTS

The firm attempts to subcontract with qualified minority and female group subcontractors and subcontractors with a sizeable number of minority and female employees. Please provide names of such contractors.

VIII. RECORDS/REPORTS

The firm keeps sufficient records to determine compliance with EEO program (e.g., utilization analysis).